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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
vs.  
  
JONATHAN CHANG & WEILIN CHANG,  
  
Defendants.

Case No. 16-cr-00047 EJD

**DEFENDANTS JONATHAN & WEILIN  
CHANG'S MOTION TO SEAL EXHIBITS TO  
DOC. NO. 122**

**TO THE HONORABLE EDWARD J. DAVILA AND THE CLERK OF THE ABOVE  
ENTITLED COURT:**

Pursuant to Criminal Local Rule 56-1(b) and Civil Local Rule 79-5(b), defendants Jonathan Chang and Weilin Grace Chang, by and through counsel, hereby respectfully request that this Court issue an Order sealing the following exhibits, listed below, to Motion in Limine No. 6, Doc. No. 122. The exhibits were filed with incomplete redactions and therefore expose potential personal information that should have been redacted under the Local Rules.

1 The exhibits that should be sealed in Doc. No. 122 are:

2 Exhibit 2, Doc. No. 122-2  
3 Exhibit 3, Doc. No. 122-3  
4 Exhibit 4, Doc. No. 122-4  
5 Exhibit 6, Doc. No. 122-6  
6 Exhibit 7, Doc. No. 122-7  
7 Exhibit 8, Doc. No. 122-8  
8 Exhibit 9, Doc. No. 122-9 (manually filed with the court)  
9 Exhibit 13, Doc. No. 122-13  
10 Exhibit 16, Doc. No. 122-16  
11 Exhibit 20, Doc. No. 122-20  
12 Exhibit 22, Doc. No. 122-22  
13 Exhibit 24, Doc. No. 122-24  
14 Exhibit 25, Doc. No. 122-25  
15 Exhibit 33, Doc. No. 122-33  
16 Exhibit 34, Doc. No. 122-34  
17 Exhibit 35, Doc. No. 122-35  
18 Exhibit 36, Doc. No. 122-36  
19 Exhibit 38, Doc. No. 122-38  
20 Exhibit 40, Doc. No. 122-40  
21 Exhibit 41, Doc. No. 122-41  
22 Exhibit 42, Doc. No. 122-42

23 This motion is supported by the Declaration of Matthew A. Laws, which is attached hereto, and  
24 all records, filings and pleadings in this action.  
25

26 Dated: JULY 17, 2019

Respectfully submitted,

27 /s/

28 Christopher J. Cannon  
Matthew A. Laws  
Attorneys for WEILIN CHANG

/s/

Julia M. Jayne  
Attorney for JONATHAN CHANG